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February 13, 2013

Via Certified Mail
Return Receipt Requested
Receipt No.: 7160 3901 9848 9067 3524

U.S. Environmental Protection Agency, Region 5
Superfund Division, Enforcement and Compliance Assurance Branch
ATTN: GRACE CO, ENFORCEMENT SPECIALIST, SC-5J
77 West Jackson Boulevard (SE-5J)
Chicago, IL 60604-3590

Re: Request for Information Pursuant to Section 104(e) of CERCLA for Lusher Street
Groundwater Contamination Site, Elkhart, Indiana

CERCLIS ID No.: IND 982073785

Specifically pertaining to a facility formerly occupied by Godfrey Pontoon Boat
Division, a/k/a Godfrey Marine Co., a/k/a, the Godfrey Conveyor Co., Inc., 1703
S. 13th Ave. and 1727 S. 14th Ave., Elkhart, IN 46517

Dear Ms. Co:

On behalf of Nautic Global Group, LLC ("Nautic") d/b/a Godfrey Marine Co. a/k/a the
Godfrey Conveyor Co., Inc. ("Godfrey"), we are submitting the enclosed response to the above-
referenced information request (the "Information Request"). The Information Request was
received by the Company on January 15, 2013 and therefore this response is submitted timely.

Please find below a list of all persons contributing information to responses to this
Information Request, along with a set of General Objections which Nautic incorporates by
reference here in the responses to each numbered request. Nautic's search did not uncover any
responsive documents to the Information Request.

Persons Contributing Information to Responses to the Information Request

1. Mr. Jim Orbik, Nautic Global Group, LLC, Chief Operating Officer
2. Mr. Brian Oakes, Nautic Global Group, LLC, Godfrey Facilities Manager
3. Mr. Jason Demeter, Nautic Global Group, LLC, Environmental Health & Safety Manager

Ms. Grace Co, Enforcement Specialist

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4. Joel T. Bowers, Attorney for Nautic and Godfrey, Barnes & Thornburg LLP.

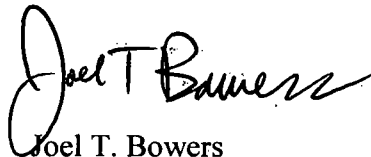
General Objections

1. Nautic objects to the Information Request to the extent it seeks to impose upon it obligations which are beyond those authorized to be imposed under 42 U.S.C. § 9604(e).
2. Nautic objects to the Instructions for the Information Request to the extent it would require it to seek information in the possession or control of persons not under its control, or to furnish information not based on personal knowledge. The Company further objects to these Instructions to the extent they seek information protected by the attorney-client privilege or which constitutes attorney work product.
3. Nautic objects to Instruction 6 in the Information Request to the extent it purports to require supplemental responses which is not authorized under 42 U.S.C. § 9604(e).
4. Nautic objects to the requirement that this response be certified because nothing in 42 U.S.C. § 9604(e) requires or authorizes U.S.EPA to impose such a requirement.

Submission of the enclosed responses should not be construed as waiver of any objection and Nautic reserves all its rights, privileges and defenses. Please feel free to contact me should you have any questions regarding this response.

Sincerely,

BARNES & THORNBURG LLP



Joel T. Bowers

JTB/dac

Enclosures

Copy to: Jim Orbik, Nautic Global Group, LLC

SBDS01 JBOWERS 377102v1

**NAUTIC GLOBAL GROUP, LLC D/B/A GODFREY MARINE CO. A/K/A THE
GODFREY CONVEYOR CO., INC.**

**Response and Objections to Request for Information Pursuant to 104(e) of CERCLA for
Lusher Street Groundwater Contamination Site, Elkhart, Indiana
CERCLIS ID No.: IND 982073785**

**Specifically pertaining to a facility formerly occupied by Godfrey Pontoon Boat
Division, a/k/a Godfrey Marine Co., a/k/a The Godfrey Conveyor Co., Inc.,
1703 S. 13th Ave. and 1727 S. 14th Ave., Elkhart, IN 46517**

RESPONSES TO REQUESTS

1. State the dates during which you or your company have owned, operated, or leased a facility or any part thereof located within the boundaries of the site and provide copies of all documents evidencing or relating to such ownership, operation, or lease arrangement (e.g. including but not limited to purchase and sale agreements, deeds, leases, etc.)

RESPONSE:

1703. S. 13th Ave., Elkhart, IN 46517 ("the 13th Ave. Property")

Upon information and belief, the Deputy Family Trust, a predecessor to the Deputy Family Limited Partnership, owned the 13th Ave. Property beginning sometime in the mid to late 1940's until the mid 1990's when the property was sold to Sturgis Iron & Metal. Nautic is not affiliated with or a successor to the Deputy Family Trust or the Deputy Family Limited Partnership.

It is believed that the Godfrey Conveyor Company, Inc. ("Godfrey")(predecessor to Nautic) had operations at the 13th Ave. Property from the late 1940's until the late 1970's. Nautic's search has revealed no documents related to the ownership, operation, or lease arrangement of the 13th Ave. Property (e.g. purchase and sale agreements, deeds, leases, etc.).

Nautic is aware of no other properties within the boundary of the Site that were owned or operated by Godfrey.

1727 S. 14th Ave., Elkhart, IN 46517 ("the 14th Ave. Property")

Upon information and belief, Nautic (Godfrey) never owned or operated the 14th Ave. Property, but it is believed that this property was owned by the Deputy Family Trust and the former building on that property was used to store items belonging to the Deputy Family. Nautic is unaware when the Deputy Family Trust may have purchased the 14th Ave. Property, but it is believed to have sold the property to Sturgis Iron & Metal sometime in the 1990's.

2. Did you or any other person or entity ever use, purchase, store, treat, dispose, transport or otherwise handle any material containing chlorinated solvents, including but not limited

to, trichloroethylene (TCE); trichloroethane (1,1,1-TCA); dichloroethene (trans 1,2 DCE; cis-1,2-DC; or 1,1-DCE) or tetrachlorethylene (PCE) at a facility within the boundaries of the site? If the answer to this question is anything but an unqualified "no," with respect to each facility identify:

- a) the chemical composition, characteristics, physical state (e.g., solid, liquid) of each material;
- b) who supplied the material;
- c) how, when, and where the material was used, purchased, generated, stored, treated, transported, disposed of or otherwise handled;
- d) the quantity of such materials used, purchased, generated, stored, treated, transported, disposed of or otherwise handled;
- e) all supervisory personnel for areas where chlorinated solvents were identified above. For each person identified, indicate the years during which they were a supervisor and, to the best of your knowledge and belief, their duties and responsibilities.

RESPONSE:

Nautic is not aware of any use, purchase, storage, treatment, disposal, transport or handling of chlorinated solvents at 13th Ave. Property. Although it did not operate any other property within the Site's boundaries, Nautic has no knowledge of the use, purchase, storage, treatment, disposal, transport or handling of chlorinated solvents at other properties within the Site's boundaries including the 14th Ave Property.

3. Identify all past and present solid waste management units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) at each facility you or your company have owned, operated, or leased within the boundaries of the site. For each such solid waste management unit, provide the following information:
 - a) a map which shows the unit's boundaries and the location of all known solid waste management units, whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units.
 - b) the type of unit (e.g., storage area, landfill, waste pile, etc.) and the dimensions of the unit;
 - c) the dates that the unit was in use;
 - d) the purpose and past usage of the unit (e.g., storage, spill containment, etc.);

- e) the quantity and types of materials (hazardous substances and any other chemicals) located in each unit;
- f) the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit; and
- g) if unit is no longer in use, describe how the unit was closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.

RESPONSE:

Nautic is not aware of any solid waste management units at the 13th Ave. Property which is the only property that Nautic (Godfrey) is believed to have operated within the boundaries of the Site.

4. Identify all leaks, spills, or releases into the environment of any chlorinated solvents or materials containing chlorinated solvents that have occurred at or from any facility you or your company have owned, operated, or leased within the boundaries of the site. In addition, identify:
 - a) when, where, and how such leaks, spills or releases occurred;
 - b) the amount of each leak, spill or release;
 - c) activities undertaken in response to each such leak, spill or release, including the notification of any agencies or governmental units;
 - d) investigations of the circumstances, nature, extent or location of each leak, spill or release, including the results of any soil, water (ground and surface), or air testing undertaken; and
 - e) all persons with information relating to these leaks, spills or releases.

RESPONSE:

Nautic is not aware of any leaks, spills, or releases into the environment of any chlorinated solvents or materials containing chlorinated solvents at the 13th Ave. Property which is the only property that Nautic (Godfrey) is believed to have operated within the boundaries of the Site.

5. Provide copies of all local, state, and federal environmental permits ever granted for any facility (or any part thereof) you or your company have owned, operated, or leased within the boundaries of the site (e.g., RCRA permits, NPDES permits, etc.)

RESPONSE:

Nautic's search for historic documents revealed no copies of any local, state, and federal environmental permits related to the 13th Ave. Property which is the only property that Nautic (Godfrey) is believed to have operated within the boundaries of the Site.

6. Identify any persons or entities, other than those responding to this information request, that may have information about the history, use, purchase, storage, treatment, disposal, transportation or handling of any materials containing chlorinated solvents at any facilities in the area identified as the Lusher Street Ground Water site.

RESPONSE:

- **Lawrence Deputy, Deputy Family Limited Partnership**
 - **Robert Deputy, Deputy Family Limited Partnership**
 - **Don Mabrey, the Godfrey Conveyor, Inc. (former Maintenance Personnel) - Deceased**
7. To the extent you believe that another person, including any previous property owner, is responsible for any leaks, spills or releases into the environment of any chlorinated solvents or materials containing chlorinated solvents or from any facility you or your company have owned, operated, or leased within the boundaries of the site, identify:
- a) the name and address of that person or persons;
 - b) when, where, and how such leaks, spills or releases occurred;
 - c) the amount of each leak, spill or release; and
 - d) the detailed basis for your belief that each such person is responsible for leaks, spills or releases, including any transactional documents, reports, or other documentation supporting your belief.

RESPONSE:

As stated in response to Request 5, Nautic is not aware of any leaks, spills, or releases into the environment of any chlorinated solvents or materials containing chlorinated solvents at the 13th Ave. which is the only property Nautic (Godfrey) may have operated within the boundaries of the Site. Therefore, Nautic is unaware of any leaks, spills, or releases caused by "other persons including any previous property owner."

Respectfully submitted,

NAUTIC GLOBAL GROUP, LLC

By: Jason Demeter

Its: EHS Manager

Date: February 13, 2013

CERTIFICATION

I hereby certify that the foregoing responses are true and correct to the best of my knowledge and belief based upon the information and records available to me.

NAUTIC GLOBAL GROUP, LLC

By: Jason Demeter

Its: EHS Manager

Date: February 13, 2013

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OF RETURN ADDRESS. FOLD AT DOTTED LINE

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7160 3901 9848 9067 3524



FROM:

BARNES & THORNBURG LLP

JTB

600 1ST SOURCE BANK CENTER
100 NORTH MICHIGAN
SOUTH BEND, INDIANA 46601

TO:

U.S. Environmental Protection Agency, Region 5
Superfund Division - Enforcement & Compliance Assurance
Branch
ATTN: GRACE CO, ENFORCEMENT SPECIALIST, SC-5J
77 West Jackson Boulevard (SE-5J)
Chicago, IL 60604-3590



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